

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IONA WEST,	§	
Plaintiff,	§	
	§	
vs.	§	C.A. No. 4:18-CV-04627
	§	
	§	Jury Demanded
HONEYWELL INTERNATIONAL	§	
INC.,	§	
Defendant.	§	

**PLAINTIFF’S EX-COUNSEL RESPONSE TO PRO SE PLAINTIFF’S MOTION TO
COMPEL**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Gene Watkins, hereinafter called Plaintiff’s Ex-Counsel, in response Pro Se Plaintiff Iona West’s, hereinafter called Plaintiff, Motion to Compel shows unto the Court the following:

FACTS

1. On or about March 1, 2022, Parties came to a status conference in the above referenced matter in regards to Ex- Counsel’s Motion to Withdraw.
2. This Court granted said motion.
3. At this hearing, this Court instructed both parties to “figure it out....”, with regards to getting the file back. A mandate requiring mutual cooperation, but was met by Plaintiff’s pattern of inimical behavior.
4. File was shipped on March 14, 2022, prior to the filing of Plaintiff’s motion.
5. Tracking has that file was delivered to Plaintiff on March 23, 2022. See Exhibit 1 (Ex-Counsel’s tracking documents of Plaintiff’s. File.

ARGUMENT

6. This matter is moot. Ex- Counsel proactively, and with zero cooperation from Plaintiff, incurred the fee and time for a matter which the Court directed both parties to handle.

7. Further, a motion to compel is not the appropriate motion filed by Plaintiff. A motion to compel is proper amongst two opposing parties in opposition in a lawsuit. Plaintiff and Ex-Counsel have no such relationship in this matter. Ex- Counsel is not a party to this lawsuit, though still reserving a financial interest.

PRAYER

WHEREFORE, PREMISES CONSIDERED, Ex- Counsel, Gene Watkins, respectfully prays that the Plaintiff's motion be denied as Moot and inapplicable.

Respectfully submitted,

By: /s/Gene A. Watkins
Gene A. Watkins
Attorney-in-Charge
Texas Bar No. 25058954
Southern District Bar No: 1129993
E-Mail: gwatkins@shermanwatkins.com
1418 Washington Avenue
HOUSTON, TX 77002
Tel. (713) 224-5113
Fax. (866) 560-8676
Attorney for Plaintiff
Iona West